

EXHIBIT 1-1

**IN THE SUPREME COURT
FOR THE STATE OF NEW YORK
(COMMERCIAL DIVISION)**

RUDERSDAL, EOOD,

By: Erik Bresling

Director

Sømarksvej 17

2900 Hellerup, Denmark

Case No. _____

JURY TRIAL DEMANDED

ALL SEAS PROPERTY 2, OOD,

By: Yordanka Zhekova Georgieva

Manager

15 Seliolu Street

Floor 1, Apartment 2

Varna Center

Varna, Bulgaria 9002

ASSET MANAGEMENT, EAD,

By: Svetlozar Kasabov

Tzar Ivan Assen 1

Ground/Parter Floor

Turgovishte, Bulgaria 7700

ZAHARI TOMOV,

Individually and as

Special Counsel to U.S. Trustee

In U.S. Bankruptcy Court,

Beli Lili Street, No. 30

Floor 3, Suite 13

Varna, Bulgaria 9000

Plaintiffs,

v.

PHILIP ROBERT HARRIS,

459 Chippendale Drive

Rockwall, TX 75032

AYR LOGISTICS LIMITED, INC.,

By: Philip Robert Harris)
President and General Manager)
459 Chippendale Drive)
Rockwall, TX 75032)
)
ANTHONY DENNIS HARRIOTT,)
21 Foxcroft Drive)
Princeton, NJ 08540)
)
GRANT CAPITAL)
INVESTMENTS, LTD.)
By: Anthony D. Harriott)
Director)
21 Foxcroft Drive)
Princeton, NJ 08540)
)
FIRST INVESTMENT BANK, AD,)
By: Nedelcho Vasilev Nedelchev)
Director)
37 Dragan Tzankov Boulevard)
Municipality Stolichna)
Sofia, Bulgaria 1797)
)
TSEKO TODOROV MINEV,)
20 Dospat Str.)
Fl. 4, Ap. 12)
Sofia, Bulgaria 1463)
)
IVAILO DIMITROV MUTAFCHIEV,)
26 Krushova Gradina Str.)
Sofia, Bulgaria 1415)
)
CHAVDAR ANGELOV ANGELOV,)
Tourist Lodge in the)
Aladzha Manastir locality)
Primorski District)
Varna, Bulgaria 9007)
)
ALL SEAS MANAGEMENT, LTD.)
By: Registered Agent)
Marshall Islands Management Company)
Trust Company of the Marshall Islands, Inc.)

Trust Company Complex, Suite 206)
Ajeltake Road, Ajeltake Island)
P.O. Box 3055)
Majuro, MH 96960)

BLUE FINANCE LIMITED)

By: Registered Agent)
Marshall Islands Management Company)
Trust Company of the Marshall Islands, Inc.)
Trust Company Complex, Suite 206)
Ajeltake Road, Ajeltake Island)
P.O. Box 3055)
Majuro, MH 96960)

DELYAN SLAVCHEV PEEVSKI,)

6 Atanas Dalchev Street)
Sofia, Bulgaria 1113)

NSN INVESTMENT, EOOD,)

By: Alexander Kirilov Georgiev)
119 Ekzarh Yosif Street)
Oborishte District)
Sofia, Bulgaria 1527)

BULGARTABAC HOLDING, AD,)

By: Radoslav Vasilev Rahnev)
Director)
62 Graf Ignatiev Street)
Sofia, Bulgaria 1000)

BULGARIAN NATIONAL BANK,)

By: Dimitar Radev)
Governor)
1 Knyaz Alexander I Square)
Sofia, Bulgaria 1000)

STANISLAV GEORGIEV LYUTOV,)

Individually and as BNB Conservator)
22 Anton Chehov Street)
1 Floor Apt 16)
Sofia, Bulgaria 1113)
Conservator of Corporate Commercial Bank)

ELENA ZDRAVKOVA

KOSTADINCHEV,

Individually and as BNB Conservator

District Lager

Building 12, Entrance B, Floor 1 Apt. 1

Sofia, Bulgaria 1612

Conservator of Corporate Commercial Bank

TABAK MARKET, AD,

By: Victor Nikolaev Nalbantov

Director

161 Knyaz Boris I Street

Vazrajane District

Sofia, Bulgaria 1202

CIBOLE SERVICES INCORPORATED,

BULGARIA, EOOD,

By: Gergana Kirilova Angelova

Manager

11 Antim I Street

Vazrajane District

Sofia, Bulgaria 1303

ASTERIA BG, EOOD

a/k/a DROSLIAN BULGARIA, EOOD,

By: Borislav Ivanov Borisov

Manager

10 Doyran Street

Krasno Selo District

Sofia, Bulgaria 1700

VILI VIST, EAD,

By: Nikolai Milev Milev

Director

47 Industrialna Street

Burgas, Bulgaria 8000

PROMISHLENO STROITELSTVO

HOLDING, EAD,

By: Kamen Stoyanov Kanev

Director

1 Zavodska Street)
Village of Yana)
Sofia, Bulgaria 1895)

THE BANK OF NEW YORK)
MELLON CORPORATION,)
One Wall Street)
New York, New York 10286)
By: Registered Agent)
New York State Secretary of State)
New York Dept. of State)
One Commerce Plaza)
99 Washington Avenue)
Albany, NY 12231)

EATON VANCE STRUCTURED)
EMERGING MARKETS)
EQUITY FUND, LLC,)
By: Eaton Vance Management)
New York State Secretary of State)
New York Dept. of State)
One Commerce Plaza)
99 Washington Avenue)
Albany, NY 12231)

THE BANK FOR FOREIGN TRADE OF)
THE RUSSIAN FEDERATION,)
a/k/a VTB BANK)
By: Anton G. Siluanov)
Chairman of the Supervisory Council)
Or)
By: Andre L. Kostin)
President and Chairman of VTB Bank)
Registered Address:)
29 Bolshaya Morskaya Street)
St. Petersburg, Russia 190000,)

Defendants.)

COMPLAINT

Plaintiffs RUDERSDAL, EOOD (hereinafter “Rudersdal”), ALL SEAS PROPERTY 2, OOD (hereinafter “ASP2”), ASSET MANAGEMENT, EAD (hereinafter “Asset Management”), and ZAHARI TOMOV (hereinafter “Tomov” or “Tomov-Special Counsel”), by and through their undersigned counsel, based on both their direct claims and their purchase and assignment of claims arising out of defendant AYR LOGISTICS LIMITED, INC.’s (hereinafter “Ayr”) (a U.S. entity) U.S. Bankruptcy proceeding in Dallas, Texas (fashioned as “In re: Ayr Logistics Limited Inc.,” Case No. 14-34940-bjh-7) assigned to plaintiffs by the U.S. Trustee, as and for their Complaint against the above-named Defendants, allege as follows:

NATURE OF CLAIM

1. The U.S. bankruptcy asset of approximately \$65 million brought together the defendants in varying acts of tortious and illegal conduct for self-dealing, profit and ancillary benefit, defrauding plaintiffs of their claims to the asset as investors and creditors. It all began when Ayr acquired the Bulgarian Silver Beach Project (hereinafter “SBP”), a development project of 1048 hectares expanding the town of Balchik, Bulgaria, from APD2, in 2009 for €89 million which initially included the assumption of €88 million in FIB loans with performance in and through New York City. The sale of the Ayr SBP real property created the \$65 million asset through its wholly own subsidiary Ayr Property Development, AD (hereinafter “APD”). The conspiratorial course of conduct was intentionally designed by defendants, individually and in two identifiable groups, to obscure their tortious conduct and demonstrate a new species of concerted global scheming by gaining access to and profit in privatization mechanisms.
2. Plaintiffs seek to vindicate these wrongdoings in New York because this venue was integral and pivotal to defendants’ acts and harm to plaintiffs; in addition, in various contracts between the parties they agreed to subject themselves to venue, personal, and subject matter